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Timothy M. Ryan, Bar No. 178059 1 tryan@theryanfirm.com Barry G. Coleman, Bar No. 75383 2 bcoleman@theryanfirm.com THE RYAN FIRM 3 A Professional Corporation 4 1100 N. Tustin Avenue, Suite 200 Anaheim, California 92807 5 Telephone (714) 666-1362; Fax (714) 666-1443 6 Attorneys for Defendant FREMONT INVESTMENT AND LOAN 7 8

## IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF CALIFORNIA

TIMOTHY LOSACCO, an individual: CASE NO.: 3:08-cv-00810-JM-POR FLORENCE LOSACCO, an Date Action Filed: May 2, 2008 individual. Plaintiffs, STIPULATION TO EXTEND THE TIME IN WHICH FREMONT VS. INVESTMENT AND LOAN MAY FILE A RESPONSIVE PLEADING FREMONT INVESTMENT & LOAN. a California corporation; and DOES 1-10. inclusive. Trial Date: None set. Defendants.

Plaintiffs, Timothy Losacco and Florence Losacco served their initial complaint on Defendant Fremont Investment and Loan on June 4, 2008, and Fremont's response to the initial complaint is due not later than June 24, 2008. The parties are discussing resolution of this matter and therefore Plaintiffs, Timothy Losacco and Florence Losacco, and Defendant, Fremont Investment and Loan, do hereby stipulate by and through their respective counsel of record as follows:

It is stipulated that the time in which Fremont has to answer or otherwise respond to Plaintiffs' initial complaint be extended for thirty (30) days from June 24, 2008, and

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3:08-cv-00810-JM-POR

## THE RYAN FIRM A Professional Corporation

## PROOF OF SERVICE

I am over the age of eighteen years and not a party to the within action. I am employed by The Ryan Firm, A Professional Corporation, whose business address is: 1100 North Tustin Avenue, Suite 200, Anaheim, California 92807.

On June 25, 2008, I served the within document(s) described as: STIPULATION TO EXTEND THE TIME IN WHICH FREMONT INVESTMENT AND LOAN MAY FILE A RESPONSIVE PLEADING on the interested parties in this action:

by placing □ the original ⋈ true copy(ies) thereof enclosed in sealed envelope(s)
 ⋈ addressed as follows: □ addressed as stated on the attached mailing list.

Name & Address	Telephone / Fax / E-mail	Role
Deborah L. Raymond, Esq. L/O Deborah L. Raymond 445 Marine View Avenue Suite 305 Del Mar, CA 92014 Solana Beach, CA 92075	Tel.: (858) 481-9559 Fax: (858) 724-0747 draymond@lawinfo.com	Counsel for Plaintiffs TIMOTHY LOSACCO and FLORENCE LOSACCO

- BY MAIL (Code Civ. Proc. § 1013(a))—I deposited such envelope(s) for processing in the mailroom in our offices. I am "readily familiar" with the firm's practice of collection and processing correspondence for mailing. It is deposited with the U.S. Postal Service on that same day with postage thereon fully prepaid at Anaheim, California, in the ordinary course of business. I am aware that on motion of a party served, service is presumed invalid if postal cancellation date or postage meter date is more than one day after the date of deposit for mailing in affidavit.
- (Federal) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made.

Executed on June 25, 2008, at Anaheim, California.

TYLER J. KEMP

Proof of Service